



Privacy Policy of the Ethics and Compliance



1. Application of this Privacy Policy

This document governs the Privacy Policy of the Ethics and Compliance Channel (hereinafter, "Channel") of Redeia (hereinafter, indistinctly, the "group" or the "company"), in compliance with the legal duties derived from Law 2/2023, of 20 February, governing the protection of persons who report regulatory breaches and the fight against corruption.

The Ethics and Compliance Channel is the means that Redeia has created for you to report - confidentially and without fear of retaliation - any conduct or action contrary to the law or to the provisions of Redeia's Code of Ethics and Conduct by any member of the company or its interest groups. You can consult the list of Redeia member companies referred to in this Channel on our **website**.

Furthermore, where not provided for herein, this Privacy Policy is supplemented by the **general Privacy Policy** of our website.

For the correct configuration and design of this Channel, Redeia fully and strictly complies with the applicable regulations on data protection and, in particular, with the following regulations:

- Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR");
- Organic Law 3/2018, of 5 December, on the Protection of Personal data and Guarantee of Digital Rights ("LOPD");
- Law 2/2023 of 20 February on the protection of persons who report regulatory breaches and the fight against corruption.
- Other European and Spanish implementing legislation that may be applicable.

2. Ensuring Confidentiality and a Responsible Use of the Ethics and Compliance Channel

Redeia guarantees the confidentiality of both your personal data and the information you provide us with through the Channel. In this respect, reporting persons may decide whether or not to identify themselves when making a report. Anonymous complaints are therefore accepted. However, in order to obtain more information about the facts reported, reporting individuals are encouraged to identify themselves.

At this point, the reporting person who wishes to disclose their identity must inform Redeia of their current and accurate personal data, so that the information contained in its systems is updated and error-free (in particular, the data through which Redeia can contact him for any matter related to the complaint or enquiry submitted).

It is your duty to make responsible use of the Channel, so under no circumstances should you make unfounded or bad faith complaints, in which case legal and/or disciplinary action may be taken. In addition, your reporting of any other person should be respectful of decorum and decency. The company is not liable for any derogatory comments you may make against any third party.

The reporting person declares that the communications are made in good faith and for facts of which he has had direct or indirect knowledge, without prejudice to any possible lack of evidence or any possible error, inaccuracy or omission that he may unintentionally commit.

3. Controller

This Channel is aimed at all people who form part of Redeia, as well as its interest groups, including any person (natural or legal) who has had, has or may have a professional relationship (or in the framework of a professional context) with any of the commercial companies that make up Redeia ("Third Party"). You can consult the companies that form part of Redeia by clicking on the following link: <https://www.redeia.com/es/conocenos>.

The entity legally responsible for the processing of the personal data collected will be the parent company of Redeia, Redeia Corporación, S.A., with tax identification number A-78003662 and postal address for notification purposes: Paseo Conde de los Gaitanes nº 177, La Moraleja, 28109 Alcobendas (Madrid). Telephone contact on: +34 91 728 62 15 (Monday to Friday from 8:00 to 18:00).

Redeia has appointed a Data Protection Officer, who can be contacted at dpd@redeia.com.

4. What Data do We Process?

The personal data to be processed will consist of identification and contact data (name, surname, pseudonyms, email addresses, telephone number, etc.), professional data (job title) and data relating to any category that may be provided by means of the facts reported or by means of the attached evidence.

In any case, personal information will only be processed if it is strictly and objectively necessary, adequate, relevant and not excessive, taking into consideration the purposes set out in section 5 below.

5. What Will We Process your Personal Data for and on What Grounds?

As indicated below, the following purposes are pursued with the processing of the data collected through the Channel, each with its corresponding legitimate basis:

a) Compliance with Law 2/2023 of 20 February on whistleblower protection.

Firstly, we will process the personal information collected (that provided by the reporting person or that collected in the framework of the investigation that may be carried out) for the purpose of (i) managing and investigating the complaints made about possible breaches of our Code of Ethics and Conduct or the regulations in force, that may involve a criminal or administrative, serious or very serious breach, and (ii) adopt the legally established safeguards to prevent possible retaliation, in compliance with the provisions of Law 2/2023, of 20 February, on the protection of whistleblowers.

If the reporting person makes their complaint verbally and it is recorded by means of a video recording (image and voice), Redeia will process it based on their consent as a legitimating basis.

b) Preventing criminal compliance risks as a public interest mission

On the other hand, the personal data collected will also be processed for the fulfilment of a mission carried out in the public interest, such as the prevention, detection and discovery of possible risks and breaches that may occur and that may generate criminal liability for any of the trading companies that make up Redeia.

c) Attention and response to possible enquiries and suggestions, due to the legitimate interest of the person making them.

If it is not a complaint, but an enquiry (prior to a possible subsequent complaint), or a suggestion for improvement related to the Code of Ethics and Conduct, or communications about facts or enquiries with other bodies of the company linked to the supervision of legal duties and commitments assumed by the organisation, Redeia will process the information received in order to attend to, manage and duly respond to it. The above will be carried out on the basis of the legitimate interest of Redeia, as a legitimate basis, which does not prejudice or harm the privacy of the person making the enquiry, and also of the person making the enquiry or suggestion, as they also have a legitimate interest in obtaining a due response.

d) To have evidence of the correct functioning of Redeia's Compliance System, in Redeia's legitimate interest.

In addition, personal data may be collected within the framework of this Ethics and Compliance Channel due to Redeia's interest in having evidence of the correct functioning of the company's Compliance System. The above will be carried out due to the legitimate interest of Redeia, which also does not harm or prejudice the privacy of the

persons concerned, and also due to the legitimate interest of the latter, who also have a legitimate interest in the company in which they work or for which they provide their services having and applying an adequate and effective Compliance System.

Under the European Data Protection Regulation 2016/679, and both for what is described in this paragraph d) and in paragraph c) above, Redeia has developed the relevant "*balancing test*", an internal analysis that confirms the provenance and relevance of such legitimate interest.

e) Other possible uses that may become legally binding

Personal data may also be processed in order to comply with certain legal duties applicable to Redeia. For example, if they are requested by a judicial body or the competent public administration.

6. Data Retention

The personal data of the person lodging the complaint or enquiry, of the reported person, and of third parties who may be mentioned in the complaint or enquiry or may participate in its investigation (e.g. possible witnesses) will be processed (i) for the time necessary to decide whether to initiate an investigation into the reported facts, (ii) if necessary, for the time during which the relevant investigation is being carried out and, finally, (iii) throughout the taking of the corresponding legal actions. In the case of an enquiry or suggestion, for the time necessary for its management, processing and response.

After that, Redeia will retain this data: (i) to comply with possible applicable legal duties, as well as (ii) to meet possible claims and liabilities, keeping them duly blocked, for the maximum legally established periods, at the disposal of judicial bodies or the competent Public Administration for a maximum legal period of ten years.

7. Recipients

As a general rule, Redeia will not pass on the data it collects through its Ethics and Compliance Channel to any third party. Thus, only personnel who, by virtue of their functions and responsibilities, are duly and previously authorised may have access to them.

If, after the investigation process, it is agreed that legal or disciplinary measures should be taken against the reported person, Redeia will pass on the strictly necessary information to the Redeia entity with which the reported person has a contractual relationship (of an employment or commercial nature, as appropriate) in order to carry out and execute the relevant legal actions.

In the event that it is legally required, the data collected may be communicated to those third parties to whom Redeia is legally required to provide them, such as judicial bodies or the competent Public Administration.

Redeia may also rely on the cooperation of third party service providers, who may have access to such personal data and who will process them on its behalf and for its account. In this respect, it is made clear that Redeia follows strict criteria for the selection of suppliers, in order to comply with its duties in terms of, in particular, data protection. Thus, and in order to regulate the Privacy conditions under which these possible third party providers will act, Redeia will impose on them, in particular, the following duties: to apply appropriate technical and organisational measures; to process the personal data for the agreed purposes and only under Redeia's documented instructions; and to delete or return the data once the provision of the services has been completed.

This is mentioned because Redeia may contract the provision of services with third party suppliers that carry out their activity, by way of example and without limitation, in the following areas: legal advice, multidisciplinary professional services companies, or companies that provide technological or computer services.

In these cases of intervention of a third-party provider in charge of processing:

- It will follow Redeia's documented instructions rigorously and punctually.

- It will not use such data for any other purpose.
- It will implement security measures - technical and organisational - to ensure the confidentiality of the information it accesses.
- It will not communicate the data it accesses to third parties, not even for storage purposes.

8. International Data Transfers

As a general rule, all personal data collected within the framework of this Channel will be stored and processed in the European Union, in strict compliance with the above European Regulation 2016/679.

However, as Redeia is a multinational group, there is a possibility that in specific situations data may be processed outside the European Economic Area (EEA)¹. This could be the case if the complaint concerns one of the employees or managers of these subsidiaries.

In these cases, to ensure the protection of personal data in these countries, Redeia will sign with the subsidiary in question the standard contractual clauses legally established at any given time and will ensure that the necessary guarantees are adopted to ensure such protection. For further information, please contact Redeia's Data Protection Officer (dpd@redeia.com).

9. Rights of the Persons Concerned

Individuals whose personal data may be processed in the framework and context of this Channel have the right to obtain confirmation as to whether personal data relating to them are processed and, if so, the right of access to their personal data, the purposes of the processing and the categories of personal data concerned.

As a measure to ensure the confidentiality of the reporting person, it is important to note that the exercise of the right of access by the reported person does not automatically entail access to the identity of the informant.

If the data subject has given his consent to the recording of his verbal complaint, he will have the right of portability of such recording and may revoke his consent at any time, without retroactively affecting the processing of personal data carried out up to that time.

Furthermore, any person whose data are processed within the framework of this Channel will have the right to request the rectification of inaccurate data or, where appropriate, to request their erasure when the data are no longer necessary for the purposes for which they were collected; the consent on which the processing is based has been withdrawn or the person objects to the processing; the personal data have been unlawfully processed; or the data must be erased in order to comply with a legal duty under EU or Member State law.

He may request the restriction of the processing of his data if he contests the accuracy of the personal data during the period which allows the controller to verify the accuracy of the personal data; the processing is unlawful and the data subject objects to the erasure of the personal data and requests instead the restriction of their use; the controller no longer needs the personal data for the purposes of the processing, but the data subject needs them for the establishment, exercise or defence of claims; or the data subject has objected to the processing, while it is being verified whether the legitimate grounds of the controller outweigh those of the data subject. In such cases, we will only retain the data for the exercise or defence of claims.

In certain circumstances and for reasons related to your particular situation, you may object to the processing of your data, Redeia as data controller will stop processing the data, except for mandatory legitimate reasons, or the exercise or defence of possible claims.

¹ Specifically, Redeia has subsidiaries in the following countries outside the European Economic Area: Chile, Peru, Brazil, Mexico, Argentina, Colombia, Ecuador and the United Kingdom.

However and under the provisions of the above Law 2/2023, in the event that the person to whom the facts described in the communication refer exercises the right to object, unless there is evidence to the contrary, it will be presumed that there are mandatory legitimate reasons for the processing of his personal data.

When the affected persons exercise their rights of access, rectification, suppression, opposition, limitation of processing and not to be subject to automated individualised decisions, they must duly accredit themselves and request this by email to the address digame@redeia.com.

If you believe that your personal data have not been processed under the regulations, you can contact Redeia's Data Protection Officer at dpd@redeia.com. Similarly, you may file a complaint with the Spanish Data Protection Agency, especially when you have not obtained satisfaction in the exercise of your rights, through the electronic headquarters at www.aepd.es.

10. How do We Guarantee the Security of your Data?

Redeia implements and maintains appropriate technical and organisational measures to ensure an adequate level of security based on prior risk analysis.

Specifically, Redeia has established all the technical means at its disposal to prevent the loss, misuse, alteration, unauthorised access and theft of the data you provide us with.

Redeia has also carried out an analysis of the different existing data protection risks with regard to the processing operations identified in this document. This is an assessment in which, based on the necessity and proportionality of the processing to be carried out with regard to its purpose, evaluates the risks to the rights and freedoms of the reporting person, the data subject and any other data subjects involved in the complaint or enquiry and considers the measures envisaged to address, manage and seek to mitigate them, thus ensuring the protection of their personal data.

The issues analysed have considered the following aspects:

- volume of data subject to each processing operation;
- involvement of third parties in the data flow;
- assessment of personal aspects of natural persons;
- categorisation and segmentation;
- carrying out solvency management tasks;
- use of external files as a reference;
- contracting external suppliers;
- transfer of data;
- legitimate bases for processing and
- the possibility for data subjects to exercise their data protection rights, in particular.

Following the analyses carried out, Redeia has carried out the Data Protection Impact Assessments that have been determined on the basis of the risk analyses previously carried out. Any further information about them can be requested at dpd@redeia.com.

11. Duty to Inform the Parties Involved

The parties involved in the complaints or enquiries received will be duly informed of the legal conditions regarding Privacy under which their personal data will be processed. In order to carry out the above, Redeia will provide the

necessary mechanisms to guarantee that the recipients of this Channel are aware of and have at their disposal, in a simple, accessible, understandable and free manner, the Privacy rules contained in this Policy.

Similarly, whenever a complaint or enquiry is made, Redeia will inform the persons concerned in particular of the collection and subsequent processing of their personal data. However, the manner in which it will do so will be handled on a case-by-case basis. At this point and regardless of the fact that this Policy is accessible on Redeia's website and corporate intranet, the following measures will be taken to reinforce and guarantee compliance with this duty to inform (depending on whether it is the reporting person, the person reported or a third party involved):

- **Reporting person or individual making an enquiry or suggestion:** any individual who submits an enquiry or suggestion, or who voluntarily identifies themselves as the informant when filing a complaint, will be informed about the processing of their data in the communication sent to acknowledge receipt. Exceptionally, this personalised notification will not be made if the reporting person has used a common or shared email account, or one that is accessible to more persons in the organisation.
- **Reported person:** as a general rule, the reported person will be informed of the lodging of a complaint against him within thirty (30) calendar days of its receipt. However, as provided for in Law 2/2023, it will be necessary to assess on a case-by-case basis whether informing her of the lodging of the complaint against her within this deadline could jeopardise the proper conduct and success of the investigation. In this case, in the event of a decision not to inform the person concerned at the initial stage of the investigation, such decision will be duly documented and justified.
- **Any other interested person involved in the complaint or enquiry:** third parties involved in the enquiry or complaint to be made will be informed prior to their participation in the process: e.g. a potential witness prior to his interview or statement being taken.

This Privacy Policy has been updated in: May 2023.

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Valuing the essentials